C. DUKES SCOTT EXECUTIVE DIRECTOR



DAN E ARNETT CHIEF OF STAFF

Phone: (803) 737-0800 Fax: (803) 737-0801

July 18, 2005

VIA HAND DELIVERY

Mr. Charles L.A. Terreni Chief Clerk/Administrator South Carolina Public Service Commission 101 Executive Center Dr., Suite 100 Columbia, SC 29210

> Application of Haig Point Utility Company, Inc. for Approval of an Re: Adjustment in Rates and Charges for Water and Sewer Services Docket No. 2005-34-W/S

Application of Melrose Utility Company, Inc., for Adjustments in Rates and Charges for Water and Sewer Services **Docket No. 2005-74-W/S**

Application of CUC, Inc. for Approval of New Schedule of Rates and Charges for Water and Sewerage Service Provided to its Customers at Callawassie Island and Spring Island in Beaufort County, South Carolina. Docket No. 2005-87-W/S

Dear Mr. Terreni:

Enclosed for filing please find the original and fifteen (15) copies of the Office of Regulatory Staff's Objections to the Commission's Appointment of a Technical Advisor in the above-referenced dockets. Please date stamp the extra copy enclosed and return it to me via our courier.

By copy of this letter, I am serving the necessary parties.

Sincerely,

Shama Bowyn Ham

Shannon Bowyer Hudson

SBH/rng

Enclosures

cc:

G. Trenholm Walker, Esquire, Counsel for Haig Point Utility Company, Inc.

Laura J. Evans, Esquire, Counsel for Haig Point Utility Company, Inc.

John F. Beach, Esquire, Counsel for Haig Point Utility Company, Inc. and

Counsel for Melrose Utility Company, Inc.

Robert Bockman, Esquire, Counsel for Melrose Utility, Inc.

Mr. Billy F. Burnett, President, CUC, Inc.

Steven G. Mikell, Esquire, Counsel for CUC, Inc.

Mr. Joe Maready

Thomas Potrykus, President, Callawassie Island Property Owners Assoc., Inc.

BEFORE

THE PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

DOCKET NO. 2005-34-W/S DOCKET NO. 2005-74-W/S DOCKET NO. 2005-87-W/S

July 18, 2005

IN RE:

(1) Application of Haig Point Utility)
Company, Inc and CUC, Inc. for Approval of an Adjustment in Rates)
And Charges for Water and Sewer)
Service; (2) Application of (CUC, Inc. for Approval of New)
Schedule of Rates and Charges (1) Schedule of Rates and Charges (2) Provided to its Customers at (3) Callawassie Island and Spring Island (3) Application of Melrose Utility (3) Application of Melrose Utility (3) Application of Approval of an (3) Adjustment in Rates and Charges (3) For Water and Sewer Services (3)

OFFICE OF REGULATORY STAFF'S OBJECTIONS TO THE COMMISSION'S APPOINTMENT OF A TECHNICAL ADVISOR

This is to certify that I, Rena Grant, an employee with the Office of Regulatory Staff, have this date served one (1) copy of the Office of Regulatory Staff's Objections to the Commission's Appointment of a Technical Advisor in the above-referenced matters to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

G. Trenholm Walker, Esquire

Pratt-Thomas, Epting & Walker, P.A.

Post Office Drawer 22247

Charleston, SC 29413

Laura J. Evans, Esquire **Pratt-Thomas, Epting & Walker, P.A**.

Post Office Drawer 22247 Charleston, SC 29413

John F. Beach, Esquire

Ellis Lawhorne & Sims, P.A.

Post Office Box 2285

Columbia, SC 29202

Robert T. Bockman, Esquire

McNair Law Firm

Post Office Box 11390

Columbia, SC 29211

Mr. Billy F. Burnett, President **CUC, Inc**. 2109 Timberlane Drive Florence, SC 29506

Steven G. Mikell, Esquire CUC, Inc. 310 West Pine Street Florence, SC 29501

Mr. Joe Maready 16 Darby Way West Columbia, SC 29170

Thomas Potrykus, President

Callawassie Island Property Owners Association, Inc.

101 Utility Court

Okatie, SC 29909

Rena Grant

Rena Muant

July 18, 2005 Columbia, South Carolina

BEFORE

THE PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

DOCKET NO. 2005-34-W/S DOCKET NO. 2005-74-W/S DOCKET NO. 2005-87-W/S

July 18, 2005

IN RE:

(1) Application of Haig Point Utility)
Company, Inc for Approval)
of an Adjustment in Rates)
And Charges for Water and Sewer)
Service; (2) Application of)
CUC, Inc. for Approval of New)
Schedule of Rates and Charges)
for Water And Sewerage Service)
Provided to its Customers at)
Callawassie Island and Spring Island)
In Beaufort County, South Carolina;)
(3) Application of Melrose Utility)
Company, Inc. for Approval of an)
Adjustment in Rates and Charges)
For Water and Sewer Services

OFFICE OF REGULATORY STAFF'S OBJECTIONS TO THE COMMISSION'S APPOINTMENT OF A TECHNICAL ADVISOR

The Office of Regulatory Staff ("ORS") respectfully objects to the appointment of a technical advisor in Docket Numbers 2005-34-WS, 2005-87-WS, and 2005-74-WS by the Public Service Commission of South Carolina ("the Commission") for the reasons set forth below.

BACKGROUND

On Wednesday, July 13, 2005, the Commission set forth a "Notice of the Commission's Intent to Appoint a Technical Advisor" ("Notice") to "assist it in understanding the testimony and making the findings needed to issue an order" for

Docket No. 2005-34-WS. (Exhibit A) The Commission requested that any objections be filed no later than Friday, July 15, 2005. The Notice stated the Commission intends to appoint Shelby LeBron, P.E., of B.P. Barber and Associates, as the technical advisor.

On Thursday, July 14, 2004, the ORS requested that all parties be provided a copy of any agreement signed by Ms. LeBron with the Commission and further requested an extension to file objections until after receipt of the agreement. The ORS suggested an extension to Monday, July 18 to file objections. Counsel for Haig Point Utility Company, Inc. ("Haig Point") also made a similar request.

On Friday afternoon, July 15, 2005, the parties were e-mailed a copy of Ms. LeBron's Agreement (Exhibit B) with the PSC in which Ms. LeBron agreed to provide technical advice to the Commission regarding Docket Numbers 2005-34-WS (Haig Point Utility Company, Inc.), 2005-87-WS (CUC, Inc.), and 2005-74-WS (Melrose Utility Company, Inc.).

OBJECTIONS

Without more information as to why a technical advisor is needed, the ORS must respectfully object to the Commission appointing a technical advisor. "Such appointments should be the exception and not the rule, and should be reserved for truly extraordinary cases where the introduction of outside skills and expertise, not possessed by the judge, will hasten the just adjudication of a dispute without dislodging the delicate balance of the juristic role." *Reilly v. United States*, 863 F.2d 149,156 (1st Cir. 1988). *Colleton County* at 625 references *Reilly*. In its Notice, the Commission cited *Colleton County v. McConnell*, 201 F.Supp.2d 618, 625 (D.S.C. 2002) in support of appointing a technical advisor. In *Colleton County*, the lawsuit's basis was alleged violations of

federal law requiring the South Carolina General Assembly to redraw district lines and included among the defendants were many South Carolina elected officials. The court appointed Mr. Bobby Bowers, Director of the South Carolina Budget and Control Board Office of Research and Statistics, as its technical advisor "due to the unusual complexity surrounding this type of case, and the skills and expertise which it requires." *Id.* Unlike the court in Colleton County, Public Service Commissioners are deemed experts by reviewing courts. "The Public Service Commission is recognized as the 'expert' designated by the legislature to make policy determinations regarding utility rates." Heater of Seabrook, Inc. v. Public Service Commission of South Carolina, 332 S.C. 20. 27, 503 S.E.2d 739, 742 (1998) citing Patton v. South Carolina PSC, 280 S.C. 288 290-290, 312 S.E.2d 257, 259 (1984). "It has been said many times that . . . the Commission is a body of experts 'composed of men of special knowledge, observation, and experience' in the field of rate regulation." Southern Bell Telephone and Telegraph Company v. Public Service Commission of South Carolina, 270 S.C. 590, 597, 244 S.E.2d 278, 282 (1978) quoting "approvingly" from State, ex rel. Utilities Commission v. General Telephone Company of the Southeast, 281 N.C. 318, 189 S.E.2d 705 (1972). Here, Ms. LeBron agreed to provide technical assistance for three upcoming Commission dockets on water and sewer matters. During the current year, 2005, the Commission has held five hearings with water or sewer companies. 1 The three upcoming matters in which Ms. LeBron agreed to provide technical assistance should not be beyond the

¹ (1) Development Service, Inc., Docket No. 2004-212-S on 1/5/05; (2) Bush River Utilities, Inc., Docket No. 2004-259-S on 1/20/05; (3) Midlands Utility, Inc., Docket No. 2004-297-S; (4) Lake Wylie Community Utilities, Inc., Docket No. 2004-353-WS on 4/27/05; and (5) Carolina Water Service, Inc., Docket No. 2004-357-WS on 5/4/05.

Commission's expertise, and without more information, the ORS must respectfully object to the Commission appointing a technical advisor.

The ORS must respectfully object to the Commission appointing Ms. Lebron as a technical advisor, because Ms. LeBron is not subject to Act 175 of 2004. In *Colleton County*, unlike the present matter, Mr. Bobby Bowers was a state employee when he served as the court's technical advisor. Not only are state and Commission employees subject to the Ethics Reform Act, but Commissioners and Commissioner employees are further restricted in their conduct under Act 175 of 2004 to the Judicial Code of Conduct. Here, Ms. LeBron is neither a Commission employee nor a state employee in general. Ms. LeBron is employed by B.P. Barber & Associates, an engineering firm. The agreement signed by Ms. LeBron is silent as to Act 175, the Ethics Reform Act, and the Judicial Code of Conduct. *See* S.C. Code Ann. § 58-3-30(B). Further, S.C. Code Ann. § 58-3-260(B) of Act 175 prohibits ex parte communication:

[A] commissioner, hearing officer, or commission employee shall not communicate, directly or indirectly, regarding any issue that is an issue in any proceeding or can reasonably be expected to become an issue in any proceeding with any person without notice and opportunity for all parties to participate in the communication, nor shall any person communicate, directly or indirectly, regarding any issue that is an issue in any proceeding or can reasonably be expected to become an issue in any proceeding with any commissioner, hearing officer, or commission employee without notice and opportunity for all parties to participate in the communication.

The agreement signed by Ms. LeBron provides no indication whether she agrees to not engage in prohibited ex parte communication. Without Ms. LeBron agreeing to the restrictions currently covering Commissioners and Commission employees, the ORS must object to Ms. LeBron providing technical advice.

The ORS must respectfully object to Ms. LeBron as a technical advisor, because it is unclear as to whether the agreement to provide technical assistance is with Ms. LeBron in her individual capacity, with B.P. Barber & Associates, Inc. or with both Ms. LeBron and B.P. Barber & Associates, Inc. The agreement's first sentence states, "This document shall constitute an agreement between the Public Service Commission of South Carolina (the Commission), 101 Executive Center Drive, Columbia, South Carolina 29210 and Ms. Shelby O. LeBron, P.E., B.P. Barber & Associates, Inc., 101 Research Drive, Columbia, South Carolina 29202." The address "101 Research Drive" is the address for B.P. Barber & Associates, Inc. ("B.P. Barber"). The agreement is signed by Ms. LeBron. If B.P. Barber is a party to the agreement, the ORS shares the same concerns with respect to conduct restrictions under Act 175 of 2004, and ORS respectfully objects to B.P. Barber providing technical advisement.

The ORS respectfully objects to technical advisement being provided in the CUC, Inc. matter, Docket No. 2005-74-WS, due to a conflict of interest. Ms. LeBron's curriculum vitae attached to the Commission's July 13, 2005 Notice states that Ms. LeBron, as an employ of B.P. Barber, prepared the Source Water Assessment Plan for Beaufort-Jasper Water & Sewer Authority ("BJWSA") and completed NPDES permit renewals for BSJSA's Hardeeville, Shell Point, Southside, and St. Helena Wastewater Treatment Plants. (Exhibit C.) CUC, Inc. purchases water from BJWSA, and its purchases from BJWSA are a material issue in the upcoming CUC, Inc. hearing. For this reason, ORS objects to any employee or associate of B.P. Barber providing technical advice to the Commission in this docket.

The ORS must respectfully object to the appointment of a technical advisor in Docket No. 2005-34-WS (Haig Point Utility Company, Inc.) for lack of sufficient notice. In *Colleton County v. McConnell*, 201 F.Supp.2d 618, 625 (D.S.C. 2002), which the Commission cited as support for appointing a technical advisor, it was noted that the lower court "provided early notice of its intention to appoint a technical advisor." *Id.* Here, the Commission provided its notice to appoint a technical advisor via e-mail on Wednesday, July 13, 2005 and requested objections no later than Friday, July 15, 2005. The hearing in Haig Point Utility Company, Inc., Docket No. 2005-34-WS, was originally scheduled for Monday, July 18, 2005; however, due to negotiations among the parties, the Commission agreed on Friday, July 15, 2005 to extend the hearing date to Thursday, July 21, 2005. Although the *Colleton County* court did not specify the number of days it deemed to constitute "early notice," it was likely more than seven business days before the hearing. Because of the late notice of the appointment of a technical advisor for Docket No. 2005-34-WS, the ORS respectfully objects to the appointment.

Lastly, the ORS respectfully objects to the appointment of a technical advisor for failure to follow reasonable procedural safeguards as recommended in *Reilly v. United States*, 863 F.2d 149, 159-160 (1st Cir. 1988). The *Reilly* court recommended that parties be notified of the expert's identity before the court makes the appointment; that the parties be given an opportunity to object on grounds such as bias or inexperience; that a "job description" for the advisor be preformulated by the court; and that the technical advisor file an affidavit attesting to his compliance with the job description at the conclusion of the matter. *Id*. The ORS respectfully objects to the appointment of a technical advisor in the upcoming matters due to insufficient notice to the parties of the

appointment and for lack of description of the duties the technical advisor is expected to perform for the Commission in each of the three dockets.

WHEREAS the ORS respectfully requests that the Commission not appoint a technical advisor until the above objections are addressed and resolved.

July 18, 2005

Florence P. Belser, Esquire
Shannon Bowyer Hudson, Esquire
Wendy B. Cartledge, Esquire
Office of Regulatory Staff
P.O. Box 11263

Columbia, South Carolina 29211

PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKETING DEPARTMENT

NOTICE OF THE COMMISSION'S INTENT TO APPOINT A TECHNICAL ADVISOR

DOCKET NO. 2005-34-W/S

HAIG POINT UTILITY COMPANY, INC. – APPLICATION FOR APPROVAL OF AN ADJUSTMENT IN RATES AND CHARGES FOR WATER AND SEWER SERVICES

Due to the unique nature of the issues surrounding this, and other, water and sewer cases, and the skills and expertise which it requires, the Commission intends to appoint Shelby LeBron, P. E., of B.P. Barber and Associates, as a technical advisor to assist it in understanding the testimony and making the findings needed to issue an order in the requisite statutory time frame. See Colleton County v. McConnell, 201 F.Supp.2d 618, 625 (D.S.C. 2002). Ms. LeBron's advice will be limited to the record before the Commission, and she will not independently present evidence or testify before the Commission. Ms. Lebron's curriculum vitae is attached as Exhibit A to this order for the information of the parties. The Commission requests that the parties give notice as soon as possible, but not later than Friday, July 15, 2005, if they should have any objection to Ms. Lebron's appointment.

Randy Mitchell, Chairman

13 July 2005

AGREEMENT

This document shall constitute an agreement between the Public Service Commission of South Carolina (the Commission), 101 Executive Center Drive, Columbia, South Carolina 29210 and Ms. Shelby O. LeBron, P.E., B.P. Barber & Associates, Inc., 101 Research Drive, Columbia, South Carolina 29202. Ms. LeBron shall provide technical advice to the Commission regarding Docket No. 2005-34-WS. Application of Haig Point Utility Company, Inc. for Approval of an Adjustment in Rates and Charges for Water and Sewer Services; Docket No. 2005-87-WS, Application of CUC, Incorporated for Approval of New Schedule of Rates and Charges for Water and Sewerage Service Provided to Its Customers at Callawassie Island and Spring Island in Beaufort County, South Carolina; and Docket No. 2005-74-WS, Application of Melrose Utility Company, Inc. for Adjustments in Rates and Charges for Water and Sewer Services. Ms. LeBron shall, at a minimum, review pertinent applications, study prefiled testimony, attend the hearings in Columbia, South Carolina scheduled in Docket Nos. 2005-34-WS, 2005-87-WS, and 2005-74-WS and provide advice on rate design, depreciation, and other technical issues. Ms. LeBron will not introduce facts not contained in the record into the Commission's deliberations. Ms. LeBron shall keep a timesheet detailing hours that she has worked and a description of her work. In return for the work performed by Ms. LeBron, the Commission will pay Ms. LeBron dollars per hour. The maximum total amount that the Commission will pay Ms. LeBron for work performed under this agreement will be twenty-five thousand dollars (\$25,000). The effective date of this agreement is July 18, 2005. The Commission may discharge Ms. LeBron at any time and without cause. If the Commission discharges Ms.

LeBron, the Commission shall pay compensation owed at the time of the termination to Ms. LeBron under this agreement.

Shelby O. LeBron, P.E.

Date: 4/15/05

Randy Mitchell, Chairman

Date:

Shelby O. LeBron, P.E. Project Engineer II

Registrations Registered Professional Engineer

South Carolina Registration No. 21990

Professional Affiliations

Water Environment Association of South Carolina

Education

Master of Science in Environmental Systems Engineering, 1998

Clemson University Clemson, South Carolina

Bachelor of Science in Civil Engineering, 1997

Clemson University Clemson, South Carolina

Experience and Related Projects

January 1999 - Present

B.P. Barber & Associates, Inc.

Columbia, South Carolina

Project Engineer responsible for various phases of engineering projects, from conception and planning to design. Experience includes wastewater, water and air permitting projects.

Source Water Assessment Programs <u>Beaufort, SC</u> – Preparing the Source Water Assessment Plan for Beaufort-Jasper Water & Sewer Authority. Conducted a windshield survey for their wells and source water to determine the susceptibility to contamination.

<u>Bennettsville</u>, <u>SC</u> - Developed a Source Water Protection Program for the City of Bennettsville Water Treatment Plant to locate potential contaminant sources for their wells and surface water source.

<u>Eastern Band of Cherokee Indians</u> - Developed a Source Water Assessment Program for the Qualla Boundary in Cherokee, North Carolina. The SWAP included one surface water source, six springs, and over thirty wells. The SWAP was coordinated with EPA Region IV and included GPS and GIS deliverables.

<u>Savannah</u>, <u>GA</u> – Preparing the Source Water Assessment Plan for the City of Savannah. Conducted a windshield survey for their surface water source to determine the susceptibility to contamination.

Wastewater Collection, Treatment & Associated Projects <u>Batesburg-Leesville</u>, <u>SC</u> – Prepared an Operation and Maintenance Manual for the Batesburg-Leesville Wastewater Treatment Plant.

<u>Batesburg-Leesville</u>, <u>SC</u> – Conducted a water and sewer rate review for the Town of Batesburg-Leesville in order to assist the Town in developing an updated rates schedule.

<u>Clio, SC</u> – Assisted in the preparation of the Preliminary Engineering Report including the evaluation of wastewater treatment plant expansion alternatives for the Town of Clio Wastewater Treatment Plant.

<u>Columbia, SC</u> – Prepared an Operation and Maintenance Manual for Stoops Creek Wastewater Treatment Plant.

<u>Dillon, SC</u> - Assisted with the preparation of a regional sewer study for Dillon County.

<u>Florence</u>, <u>SC</u> – Responsible for sludge production calculations and cost estimates for sludge disposal alternatives for the wastewater treatment plant process evaluation for the City of Florence.

<u>Hemingway, SC</u> – Assisted in the preparation of a wastewater feasibility study including the evaluation of wastewater treatment alternatives and the assessment of needs for the Town of Hemingway.

Myrtle Beach, SC – Responsible for sludge production calculations and cost estimates for sludge dewatering and sludge disposal as well as assisting in the preparation of disinfection alternatives for the preliminary engineering report for the upgrade and expansion of the Myrtle Beach Water Reclamation Facility.

<u>Mullins, SC</u> – Assisted in the preparation of the Preliminary Engineering Report for the land application of biosolids from the City of Mullins Wastewater Treatment Plant.

Orangeburg DPU, SC - Responsible for development of the sludge dewatering study preliminary engineering report for the upgrade of the Orangeburg DPU Wastewater Treatment Facility.

<u>Spartanburg Sanitary Sewer District, SC</u> - Assisted in conducting a dye study for the Landrum Wastewater Treatment Plant to modify their effluent limits.

<u>Spartanburg Sanitary Sewer District, SC</u> – Developed a sludge report outlining the semiannual reporting requirements for the Lawson Fork Wastewater Treatment Plant and the Fairforest Wastewater Treatment Plant.

<u>Spartanburg Sanitary Sewer District, SC</u> – Assisted in a process evaluation for the Lawsons Fork WWTP. The report included evaluation of alternatives for plant expansion for proposed industrial flow and 20 year growth projections.

<u>Summerton. SC</u> – Assisted in the preparation of the Preliminary Engineering Report for the Upgrade and Expansion of the Town of Summerton's Wastewater Treatment Plant and Land Application site.

<u>Timmonsville</u>, <u>SC</u> – Developed the Storm Water Pollution Prevention Plan for the Town of Timmonsville Wastewater Treatment Plant.

York, SC - Developed the Accidental Discharge/Slug Control Plan for the Meritor Heavy Vehicle Systems, LLC facility.

CMOM Audits and Programs

Anderson, SC - Assisted in the EPA Capacity, Management, Operation and Maintenance (CMOM) Audit conducted as part of the voluntary CMOM analysis program EPA asked Anderson County to participate in.

Town of Ridge Spring
Town of Timmonsville
Town of Turbeville
Westminster Commissioners of Public Works

Water Distribution & Associated Projects

<u>Anderson, SC</u> – Assisted in the preparation of the county-wide water supply study which included twenty (20) water providers and the evaluation of fire flow protection throughout the county.

<u>Bennettsville</u>, <u>SC</u> - Assisted with the preparation of the Water Quality Improvement Plan for the Bennettsville water supply system.

<u>Cassatt</u>, <u>SC</u> - Assisted with the preparation of the capital improvements plan for Cassatt Water Company.

<u>Charleston, SC</u> - Assisted with the preparation of the water and sanitary sewer guidelines for Charleston Commissioners of Public Works.

<u>Clemson, SC</u> – Assisted in the preparation of the long-term water supply study for the City of Clemson, Clemson University, and the Town of Central. Assisted in developing population and flow projections.

<u>Columbia, SC</u> - Assisted with the preparation of the Columbia Water Treatment Plant's Saluda River Feasibility Study.

Marlboro County, SC – Assisted in the preparation of the Marlboro County Water Study, which included McColl, Clio, Bennettsville, Marlboro Water Company, and Wallace Water Company.

Spartanburg, SC - Prepared projected flow data for a water study for the City of Spartanburg.

Spartanburg, SC – Developed a Water Business Plan for Startex Utilities.

Stormwater Management Programs

Assisted in the development of Stormwater Pollution Prevention Plans for the following facilities:

- Inman Wastewater Treatment Plant
- KPR Holdings, Inc.
- Meritor Automotive, Inc. facility in Manning, SC
- City of Marion's Coleman Mine
- Meritor Heavy Vehicle Systems, LLC facility in York, SC
- City of Newberry's Bush River Wastewater Treatment Plant

Spill Prevention Control and Countermeasure Plans

Assisted in the development of Spill Prevention Control and Countermeasure Plans for the following facilities:

Dilmar Oil Company, Inc. in Columbia and Florence, SC and Wilmington, NC

- ERCPSD Gills Creek Wastewater Treatment Plant and Quail Lane Pump Station
- KPR Holdings, Inc.
- Laurens County Water and Sewer Commission
- Meritor Heavy Vehicle Systems, LLC facility in York, SC
- City of Newberry's Bush River Wastewater Treatment Plant
- City of Newberry's Public Works Department

Air Permitting and Dispersion Modeling

Columbia, SC - Conducted air dispersion modeling for the American Italian Pasta Company.

Columbia, SC - Prepared at Title V air permit for American Italian Pasta Company.

<u>Greer, SC</u> - Assisted in the air modeling and preparation of the air permit for John Deere Consumer Products.

<u>Johnston, SC</u> - Conducted air dispersion modeling and assisted in the preparation of the air permit for Eastern Pacific International.

Orangeburg, SC - Prepared a Title V renewal air permit for Orangeburg DPU WWTP.

Rockingham, NC - Assisted in the preparation of emission calculations for Solene Lubricants.

<u>Timmonsville</u>, <u>SC</u> – Conducted air dispersion modeling and emission calculations as well as assisted in the preparation of the air permit for Honda of South Carolina.

Winnsboro, SC - Prepared air permit for the Town of Winnsboro.

York, SC - Conducted air dispersion modeling and assisted in the preparation of the air permit for Filtration Group Technical Media.

York, SC - Conducted air dispersion modeling and assisted in the preparation of the air permit for American Eagle Wheel Corporation.

York, SC - Conducted air dispersion modeling and assisted in the preparation of the air permit for the Meritor Heavy Vehicle Systems, LLC facility.

York, SC - Prepared a Title V air permit for Arvin Meritor CVS.

NPDES Permit Renewals

Completed NPDES permit renewals for the following facilities:

- SSSD's Idlewood WWTP
- SSSD's Buckeye Forest WWTP
- SSSD's Carolina Country WWTP
- SSSD's River Falls Plantation WWTP
- SSSD's Marilyndale WWTP
- SSSD's Roebuck Middle School WWTP
- SSSD's Clifton WWTP
- SSSD's Fingerville WWTP
- SSSD's Pacolet Mills WWTP
- SSSD's North Tyger River WWTP

Shelby O. LeBron, P.E.

- SSSD's Page Creek WWTP
- SSSD's South Tyger River Regional WWTP
- SSSD's Cowpens WWTP
- SSSD's Lawson Fork WWTP
- SSSD's Fairforest WWTP
- SSSD's R.B. Simms WWTP
- East Richland County PSD Gills Creek WWTP
- City of Myrtle Beach WRF
- Town of Clio WWTP
- Town of Hemingway WWTP
- Town of Latta WWTP
- Town of Pamplico WWTP
- Anderson County Six & Twenty WWTP
- City of Barnwell WWTP
- BJW&SA's Hardeeville WWTP
- BJW&SA's Shell Point WWTP
- BJW&SA's Southside WWTP
- BJW&SA's St. Helena WWTP
- City of Inman WWTP
- City of Newberry Bush River WWTP
- Greenwood Metropolitan District's West Alexander WWTP

Employment History

April 1997 - August 1998 City Hall, Clemson, SC

Responsible for Auto-Cad drawings and basic water and sewer calculations.